

AO 91 (REV. 5/85) Criminal Complaint

AUSA Steven A. Block 312-886-7647

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

KC FILED

DEC 05 2007  
December 5, 2007  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

## CRIMINAL COMPLAINT

ROBERT FLETCHER

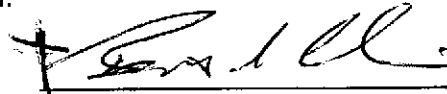
07CR 795  
CASE NUMBER:

MAGISTRATE JUDGE NOLAN

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief. On or about December 4, 2007, at Hickory Hills, in the Northern District of Illinois, Eastern Division, ROBERT FLETCHER, defendant herein,

knowingly made, uttered and possessed a counterfeited and forged security, namely a check bearing number 183300494 in the amount of \$39,000 made payable to "Madava Inc," purportedly issued by JP Morgan Chase, N.A., a legal entity that operated in, and the activities of which affected, interstate commerce, with intent to deceive another person and organization, namely, Equity Mortgage Corporation and its employees;

in violation of Title 8, United States Code, Sections 513(a). I further state that I am a Special Agent with the United States Secret Service and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.



Signature of Complainant  
BRETT COLVIN  
Special Agent, United States Secret Service

Sworn to before me and subscribed in my presence,

December 5, 2007  
Date

at Chicago, Illinois  
City and State

NAN R. NOLAN, U.S. Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

STATE OF ILLINOIS       )  
                                      )  
COUNTY OF COOK        )

**AFFIDAVIT**

I, BRETT A. COLVIN, state as follows:

1. I have been employed as a Special Agent with the United States Secret Service since May 2005. I am currently assigned to the Chicago Field Office, Financial Crimes Squad. As part of my duties I investigate financial crimes, such as counterfeit checks, access device fraud, bank fraud and forgery. I have received training in the areas of counterfeit checks, access devices, bank fraud and forgery.
2. This affidavit is based on my personal knowledge, as well as information obtained from official documents and the personal knowledge of other law enforcement officials.
3. I submit this affidavit in support of a probable cause arrest of Robert FLETCHER.
4. This affidavit does not contain all of the information known to me regarding this investigation, but rather, only those facts believed to be necessary to establish probable cause.
5. As set forth in more detail below, there is probable cause to believe that on December 4, 2007, Robert FLETCHER knowingly made, uttered, and possessed a counterfeited and forged official bank check to be used as a down payment for the purchase of property located at 6458 S. Greenwood Unit C, Chicago, IL. 60637, with the intent to deceive the lender and its employees, in violation of Title 18, United States Code, Sections 513 (a).

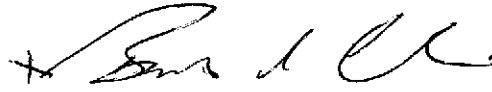
**DETAILS OF INVESTIGATION**

6. On November 29, 2007, a representative of Equity Mortgage Corporation (Individual A) contacted the United States Secret Service, Chicago Field Office to notify agents that Robert FLETCHER provided fraudulent ING Bank checking account statements to qualify for a \$313,000.00 mortgage to finance the purchase of 6458 S. Greenwood, Unit C, Chicago, IL 60637. Individual A initially questioned the ING Bank statements because the statements were online bank account printouts. Individual A contacted ING Bank to verify the existence of an account in the name of Robert FLETCHER. A representative of ING Bank verified that the bank statements were fraudulent and further stated that Robert FLETCHER was not in their system as an account holder of record.
7. Continued on this date, I requested from Equity Mortgage Corporation copies of all earnest money and down payment checks provided by or on behalf of Robert FLETCHER with regard to the mortgage approval for the above said property. Equity Mortgage Corporation provided me copies of two checks, one of which purported to be a Chase Bank Official Check serial number 183300494 in the amount of \$39,000, dated 07/30/2007. The check identified the payee as Madava Inc. and the remitter as Robert A. FLETCHER. The other check purported to be a Chase Bank Official Check serial number 829087721 in the amount of \$39,000, dated June 29, 2007. This check also identified the payee as Madava Inc. and the remitter as Robert A. FLETCHER.
8. Continued on this date, I contacted Chase Bank Law Enforcement Support Hotline to verify the legitimacy of these checks. Chase directed me to contact Integrated Payment Systems Inc, a third-party corporation who issues official checks on behalf of Chase. The Chase Bank Representative stated that Integrated Payments Systems Inc. would be able to verify the

legitimacy of the checks. I then contacted the Integrated Payment System Inc. automated check verification system. The automated system requests certain identifying information regarding a suspect check necessary to determine its legitimacy, such as serial number and amount. I input this information for Chase Bank Official Check serial numbers 183300494 and 829087721 and learned that no such valid Chase Bank checks exist.

9. After obtaining this information from the automated system, I had three separate conversations with representatives in the check verification department of Integrated Payment Systems Inc. Each of these representatives confirmed that Chase Bank Official Check serial numbers 183300494 and 82908771 are fraudulent.
10. On December 4, 2007, agents of the United States Secret Service observed the real estate closing for 6458 S. Greenwood, Unit C, Chicago, IL 60637, and observed FLETCHER at the closing. The agents further observed Chase Bank Official Check serial numbers 183300494 and 82908771 being presented by or on behalf of Robert FLETCHER at the real estate closing for 6458 S. Greenwood, Unit C, Chicago, IL 60637, for which FLETCHER was the purchaser.
11. Based on the foregoing facts, my training and experience, I believe that there is probable cause to believe that Robert FLETCHER violated Title 18, United States Code, Section 513(a).

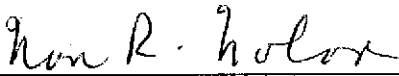
**FURTHER AFFIANT SAYETH NOT**



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Special Agent Brett Colvin  
United States Secret Service

Subscribed and sworn before me  
this 5<sup>th</sup> day of December 2007.



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Nan R. Nolan  
United States Magistrate Judge